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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

J.M., an individual,)	Case No. 2:22-cv-00672-KJM-JDP
)	
Plaintiff,)	
)	
v.)	JOINT STIPULATION TO CONTINUE
)	FACT DISCOVERY DEADLINE
CHOICE HOTELS INTERNATIONAL, INC., et)	
al.,)	
)	
Defendants.)	

WHEREAS Plaintiff J.M. (“Plaintiff”) initiated this case against Defendants Choice Hotels International Inc. (“Choice”) and Red Roof Inns, Inc. (“RRI Inc.,” and collectively with Plaintiff, the “Parties”) on April 15, 2022 (Dkt. No. 1);

WHEREAS Plaintiff filed a First Amended Complaint on June 10, 2022 (Dkt. No. 10);

WHEREAS RRI Inc. filed a motion to dismiss on December 15, 2022 (Dkt. No. 53) and received an order on that motion on May 15, 2023 (Dkt. No. 70);

WHEREAS new counsel for RRI Inc. was substituted into this case on May 18, 2023 (Dkt. Nos. 71-73);

WHEREAS RRI Inc. filed its Answer to Plaintiff’s SAC on May 26, 2023 (Dkt. No. 74);

WHEREAS the Court granted an extension of time on all pretrial dates as a result of the parties’ joint request (Dkt. 83);

WHEREAS Plaintiff added new lead counsel to this case on November 11, 2023;

WHEREAS the Parties have moved through discovery with effectiveness, having in place a protective order regarding Plaintiff’s true identity (Dkt. 86), and a confidentiality order (Dkt. 87), and an ESI protocol order (Dkt. 88), and depositions being scheduled;

WHEREAS the fact discovery deadline is set for January 3, 2024 (Dkt. 83);

WHEREAS the Parties believe good cause exists for a short extension of (1) month, to February 3, 2024, because of the very short time Plaintiff’s new counsel has taken to oversee this litigation, and the Holiday season creating difficulty in scheduling depositions, the fact depositions have been delayed.

WHEREAS all remaining deadlines remain intact (Dkt. 83).

STIPULATION

NOW, THEREFORE, Plaintiff J.M. and Defendant Red Roof Inns, Inc. stipulate and request the Court continue the presently set fact discovery date as February 3, 2024.

Respectfully submitted,

/s/ Jennifer J. El-Kadi

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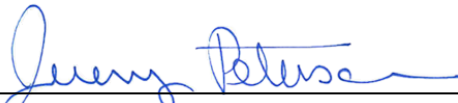
ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

The fact discovery deadline is continued from January 3, 2024 to February 3, 2024.

IT IS SO ORDERED.

Dated: January 4, 2024



JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE